



U.S. Department of Justice

United States Attorney
Southern District of New York

MEMO ENDORSED

86 Chambers Street, 3rd Floor
New York, New York 10007

November 20, 2007

BY FAX 212.805.6326

The Honorable Colleen McMahon
United States District Judge
United States Courthouse
500 Pearl St., Room 640
New York, NY 10007

Re: *Haus v. Potter*, 07 Civ. 4808 (CM) (JCF)

Dear Judge McMahon:

On behalf of the parties, I write respectfully to request that the Court permit the parties to take the deposition of plaintiff in the above-referenced case on December 14, 2007. Under the current scheduling order, plaintiff's deposition was to be taken by November 29, 2007. The parties seek no other alteration of the scheduling order.

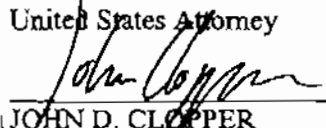
Plaintiff's counsel served discovery requests in advance of plaintiff's scheduled deposition, so that she would have the benefit of defendant's responses prior to the taking of plaintiff's deposition. However, despite its best efforts, the Government is still in the process of searching for and producing documents responsive to plaintiff's requests. In order to provide the Government with the time necessary to respond fully to plaintiff's requests and to allow plaintiff's counsel a reasonable opportunity to review such responses before depositions proceed, the parties jointly request permission for plaintiff's deposition to be taken on December 14, 2007.

Thank you for your consideration of this request.

Respectfully,

MICHAEL J. GARCIA
United States Attorney

By:


JOHN D. CLOPPER
Assistant United States Attorney
Telephone: (212) 637-2716
Facsimile: (212) 637-0033

OK


U.S. SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 11/26/07

cc: BY FAX 212.571.0860
Doris G. Traub, Esq.
Traub & Traub, P.C.
39 Broadway, Suite 2420
New York, NY 10006